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12	UNITED STATES DISTRICT COURT	
13	DISTRICT	OF NEVADA
14	DISTRICT UNITED STATES OF AMERICA,	OF NEVADA
14 15		OF NEVADA)))) 2:15-cr-00198-GMN-NJK
141516	UNITED STATES OF AMERICA,))) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE
14 15 16 17	UNITED STATES OF AMERICA, Plaintiff,))) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY
14 15 16 17 18	UNITED STATES OF AMERICA, Plaintiff, v.)) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE) ORDERS PENDING DISTRICT COURT
14 15 16 17 18	UNITED STATES OF AMERICA, Plaintiff, v. JUNZO SUZUKI & PAUL SUZUKI,)) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE) ORDERS PENDING DISTRICT COURT
14 15 16 17 18 19 20	UNITED STATES OF AMERICA, Plaintiff, v. JUNZO SUZUKI & PAUL SUZUKI, Defendants.)) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE) ORDERS PENDING DISTRICT COURT
14 15 16 17 18 19 20 21	UNITED STATES OF AMERICA, Plaintiff, v. JUNZO SUZUKI & PAUL SUZUKI, Defendants. CERTIFICATION: The undersigned))) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE) ORDERS PENDING DISTRICT COURT) REVIEW))
14 15 16 17 18 19 20 21 22	UNITED STATES OF AMERICA, Plaintiff, v. JUNZO SUZUKI & PAUL SUZUKI, Defendants. CERTIFICATION: The undersigned The United States of America, through)))) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE) ORDERS PENDING DISTRICT COURT) REVIEW)))) certify that this pleading is timely filed.
14 15 16 17 18 19 20 21	UNITED STATES OF AMERICA, Plaintiff, v. JUNZO SUZUKI & PAUL SUZUKI, Defendants. CERTIFICATION: The undersigned The United States of America, through the Division's Fraud Section, William E. Johnston)) 2:15-cr-00198-GMN-NJK)) THE GOVERNMENT'S EMERGENCY) MOTION FOR STAY OF RELEASE) ORDERS PENDING DISTRICT COURT REVIEW))) certify that this pleading is timely filed. Igh Robert Zink, Acting Chief of the Criminal

1 counsel for the United States, respectfully moves the Court for a stay of the Magistrate Judge's 2 orders of release for Defendants Junzo Suzuki and Paul Suzuki orally issued at the Suzukis' detention hearings on April 24, 2019. Because United States Immigration and Customs 3 4 Enforcement (ICE) has lodged detainers on both of the Suzukis, the Magistrate Judge temporarily 5 stayed its orders from taking effect until noon on April 26, 2019. The Government has filed a timely motion for district court review of those release orders (at ECF 297) and hereby requests 6 7 that the Court extend that stay until the district court decides the Government's motion for review. 8 Good cause for a stay exists because of the risk of flight posed by the Suzukis if they are released 9 to the public and because of the possibility of their removal from the country if they are released to ICE. 10 11 Respectfully submitted, 12 Dated: April 25, 2019 **ROBERT ZINK Acting Chief** 13 Criminal Division, Fraud Section United States Department of Justice 14 /s/ Danny Nguyen 15 DANNY NGUYEN WILLIAM E. JOHNSTON 16 Trial Attorneys Criminal Division, Fraud Section 17 NICHOLAS TRUTANICH

> United States Attorney District of Nevada

/s/ Richard Anthony Lopez
RICHARD ANTHONY LOPEZ
Assistant United States Attorney

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¹ The Government is investigating the basis for these ICE detainers. For example, Paul Suzuki is a dual citizen of both the United States and Japan and there appears no reason why he would be removable from the country.

UNITED STATES DISTRICT COURT

2	DISTRICT OF NEVADA		
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4	UNITED STATES OF AMERICA,		
	Plaintiff,	2:15-cr-00198-GMN-NJK	
5	v.	ORDER GRANTING THE	
6		GOVERNMENT'S EMERGENCY MOTION FOR STAY OF RELEASE	
7	JUNZO SUZUKI & PAUL SUZUKI,	ORDERS PENDING DISTRICT COURT REVIEW	
8	Defendants.		
9			
10	Based on the Government's pending Emergency Motion for Stay of Release Orders		
11	Pending District Court Review, and good cause appearing,		
12	IT IS HEREBY ORDERED that the Government's motion is GRANTED and		
13	that the release orders issued by the Magistrate Judge as to Junzo Suzuki and Paul Suzuki on		
14	April 24, 2019, are hereby stayed pending the outcome of the Government's motion for		
15	review of those release orders at ECF 297.		
16	Dated this25 day of April, 2019.		
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18	- Auto-		
19	Gloria M. Navarro, Chief Judge UNITED STATES DISTRICT COURT		
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CERTIFICATE OF SERVICE

I certify that I am an employee of the United States Attorney's Office, District of Nevada.

A copy of this opposition memorandum was served upon counsel of record, via Electronic Case Filing (ECF).

DATED this 25th day of April, 2019.

/s/ Richard Anthony Lopez
RICHARD ANTHONY LOPEZ
Assistant U.S. Attorney